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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

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19 TRANSPERFECT GLOBAL, INC.,
TRANSPERFECT TRANSLATIONS
20 INTERNATIONAL, INC., AND
INTERNATIONAL.COM, INC.,
21

Plaintiffs/Counter-Defendants,

22 v.
23

MOTIONPOINT CORPORATION,

24 Defendant/Counterclaimant.
25

Case No. CV 10-02590 CW (JCS)

**SECOND DECLARATION OF NIKOLAUS
A. WOLOSZCZUK IN SUPPORT OF
TRANSPERFECT'S AMENDED BILL OF
COSTS**

Judge: Hon. Claudia Wilken

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1 I, Nikolaus A. Woloszczuk declare that:

2 1. I am an associate at Latham & Watkins, and counsel for plaintiffs/counterclaim
 3 defendants TransPerfect Global, Inc., TransPerfect Translations International, Inc., and
 4 Translations.com, Inc. ("TransPerfect") in this action. Unless stated on information and belief, I
 5 make this declaration on my own personal knowledge, and if called as a witness, I could and
 6 would competently testify to the matters set forth herein.

7 2. This second declaration reflects an amendment to Exhibit C which was attached
 8 to the first declaration I submitted on November 29, 2013 (D.N. 474), and updates accordingly
 9 the total amount of costs TransPerfect requests be taxed in its Amended Bill of Costs. The
 10 attached Amended Exhibit C is intended to replace and supersede the previously submitted
 11 Exhibit C in its entirety.

12 3. Attached as Amended Exhibit C is an itemized list of the costs for the
 13 reproduction and exemplification of discovery documents and government records, visual aids at
 14 trial, and for trial exhibits provided to the Court. The costs submitted for Latham & Watkins'
 15 technical analyst are a true and accurate reflection of the hours billed to TransPerfect for time
 16 spent at trial to present exhibits and graphics using courtroom technology. Following the
 17 itemized list are true and correct copies of the invoices supporting these costs, a true and correct
 18 copy of a summary of the charges billed to TransPerfect for Latham & Watkins' technical
 19 analyst, and a true and correct copy of a summary of TransPerfect's in-house discovery work
 20 based on information provided by TransPerfect.

21 4. TransPerfect, through its attorneys, produced 202 gigabytes of documents and
 22 files to MotionPoint over the course of this litigation.

23 5. Plaintiff TransPerfect requests that the Court tax Defendant MotionPoint in the
 24 amount of \$431,820.82. TransPerfect believes that these costs are correctly stated, were
 25 necessarily incurred, and are allowable by law.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.
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4 Dated: December 6, 2013

LATHAM & WATKINS LLP

5 By /s/ Nikolaus A. Woloszczuk
6 Nikolaus A. Woloszczuk

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